This document includes Section 2.0 – LKA 113 Class, Vessels Removed from Active Duty and Non-operational of the Draft EPA Report "Surface Vessel Bilgewater/Oil Water Separator Environmental Effects Analysis Report" published in 2003.
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Section 2.0 – LKA 113 Class, Vessels Removed from Active Duty and Non-operational

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SECTION 2.0 – LKA 113 CLASS

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2.0 LKA 113 CLASS

2.1 INTRODUCTION

This Environmental Effects Analysis Report (EEAR) presents surface vessel bilgewater discharge from the Uniform National Discharge Standards (UNDS) vessel group, "Non-Operational Vessels." This group includes vessels removed from active service or commission. Vessels in this vessel group range from aircraft carriers of over 1000 ft in length to boats and craft of less than 100 ft in length. Inactivation procedures for Navy vessels call for cleaning and preservation of bilges; blanking seachests; and hydroblasting collection, holding, and transfer (CHT) systems (Navy, 1991). These inactivation procedures eliminate the majority of the bilgewater accumulation. The amphibious cargo ship CHARLESTON Class (LKA 113) was selected as the representative vessel class for this group. With five inactive vessels, the LKA 113 class comprises the largest number of large size vessels (10,000 tons and 575 ft) within the group. For more information about the vessel group and the selection of the representative vessel class used in this environmental effects analysis (EEA), see *Vessel Grouping and Representative Vessel Class Selection for Surface Vessel Bilgewater/Oil-Water Separator Discharge* (Navy and EPA, 2001g).

Minor accumulation of bilgewater in non-operational vessels could occur from condensation, rainwater that may drain from openings in the vessels' upper decks, and minor leakage from below the waterline seals and blanked openings. Little, if any, oil comes in contact with the bilge; however, the possibility still exists that residual oily contaminants may be found from minor leaks from parts such as piping, valves, flanges.

2.2 DIFFERENCES FROM THE EEA METHODOLOGY

The analysis of discharge information and the presentation of results in this report do not follow the methodology contained in *Environmental Effects Analysis Guidance for Phase II of the Uniform National Discharge Standards for Vessels of the Armed Forces* (Navy and EPA, 2000b). The rationale for deviating from the established methodology is described below.

As determined in the Bilgewater FIAR (Navy and EPA, 2002b), the CHT option is a feasible MPCD for this vessel group (CHT is currently in use for this vessel group). Application of this MPCD option involves shoreside treatment of collected bilgewater at a properly permitted facility, and thus results in no discharge of untreated bilgewater to the receiving waters. When this report was written, EPA and DoD anticipated that the level of analysis in this report would be sufficient to support choosing an appropriate MPCD performance standard for the LKA 113 vessel group because CHT is expected to be the preferred option when applying the seven considerations under the Section 312(n) of the Clean Water Act (Navy and EPA, 2002b).

2.3 SUMMARY OF EEA RESULTS

There are only minimal anticipated impacts to receiving waters if CHT is conducted appropriately. There will be no toxic constituents, conditions related to narrative water quality criteria (e.g., turbid water), non-indigenous species, or bioaccumulative contaminants of concern introduced directly to the receiving water. The only potential impact to the environment

identified for this MPCD would result from the discharge of treated bilgewater to a properly permitted facility.

2.4 MPCD RANKING AND ASSOCIATED UNCERTAINTY

CHT is the preferred option for this vessel group because it is assumed to have the least environmental impact when compared to the other MPCD options. There may be uncertainty in this limited analysis in regard to how much, if any, bilgewater is mishandled during transfer. However, because process knowledge of pierside management indicates mishandling is not a common occurrence, a determination of the frequency of this occurrence and associated uncertainty was not performed. Regardless of this minor aspect of uncertainty, CHT is the preferred option due to its minimal impact on the environment.